

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DARRELL A. PURIFOY and LYNDA C.
PURIFOY, on Behalf of Themselves and All
Others Similarly Situated,

Plaintiffs,

WALTER INVESTMENT MANAGEMENT
CORPORATION; GREEN TREE
SERVICING, LLC; GREEN TREE
INSURANCE AGENCY, INC.;

Defendants.

Case No. 1:13-cv-00937-RJS

CLASS ACTION

DEMAND FOR JURY TRIAL

**NOTICE OF MOTION TO DISMISS
FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law in support of their motion to dismiss, and all papers submitted and proceedings had in this action, and pursuant to the Court's electronic order dated June 11, 2013, Defendants Walter Investment Management Corporation, Green Tree Servicing, LLC, and Green Tree Insurance Agency, Inc. will move this Court, at a date and time to be set by the Court, for an order dismissing Plaintiffs' First Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(6), and for such other relief as this Court deems just and proper.

Dated: June 21, 2013.

By: /s/Erik Kemp

John B. Sullivan (Cal. State Bar No. 96742)
Mark D. Lonergan (Cal. State Bar No. 143622)
Erik Kemp (Cal. State Bar No. 246196)
(*admitted pro hac vice*)

SEVERSON & WERSON

A Professional Corporation
One Embarcadero Center, Suite 2600
San Francisco, California 94111
Telephone: (415) 398-3344
Facsimile: (415) 956-0439
jbs@severson.com
mdl@severson.com
ek@severson.com

David S. Versfelt (DV 8935)

K&L GATES LLP

599 Lexington Avenue
New York, NY 10022
Phone: 212.536.3991
Fax: 212.536.3901
david.versfelt@klgates.com

Attorneys for Defendants
WALTER INVESTMENT MANAGEMENT
CORPORATION; GREEN TREE SERVICING,
LLC; and GREEN TREE INSURANCE
AGENCY, INC.

CERTIFICATE OF SERVICE

I, Erik Kemp, hereby certify that on June 21, 2013 the foregoing document, filed through the ECF system, will be electronically sent to those indicated on the Notice of Electronic Filing as registered participants, and hard copies will be sent to those indicated as non-registered participants.

/s/ Erik Kemp

ERIK KEMP